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IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MICHIGAN
(113 Federal Bldg, 315 W Allegan St, Lansing MI 48933)

Ronald Satish Emrit,
Plaintiff (Pro Se)

v.

The Grammys Awards on CBS d/b/a
The Recording Academy/National
Academy of Recording Arts and
Sciences (NARAS),
Defendant

C. A. No.:

FILED - LN

September 11, 2023 10:32 AM
CLERK OF COURT
U.S. DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
BY: jlg / SCANNED BY: [Signature]

1:23-cv-953

Hala Y. Jarbou
Chief U.S. District Judge

COMPLAINT

COMES NOW, the plaintiff Ronald Satish Emrit, who is bringing forth this complaint against the sole defendant The Grammys on CBS d/b/a The Recording Academy/NARAS seeking \$45 million dollars in punitive, compensatory, and treble damages. In bringing forth this complaint, the plaintiff states, avers, and alleges the following

I.) NATURE OF THE CASE

- 1.) Kanye West is a very sick man who is anti-semitic
- 2.) Robert Kelly is a very sick man
- 3.) Harvey Weinstein is a very sick man
- 4.) Kevin Spacey is a very sick man
- 5.) Lizzo is a sick woman and very ugly inside and out

- 6.) The defendant Grammy Awards is having significant public relations problems given the legal problems of their recording artists and executives like Harvey Weinstein.

II.) PARTIES TO THIS LITIGATION

7.)The plaintiff is an indigent, disabled, and unemployed resident of the state of Florida and Maryland (the plaintiff spends half of the year in Florida and the other half in Maryland traveling with his father who is a widely-recognized musician in several states on the Atlantic coast). His current mailing address is 5108 Cornelias Prospect Drive, Bowie, Maryland 20720. His cell phone number is currently (703)936-3043 and his primary email address is einsteinrockstar2@outlook.com.

8.) I am letting your office know that I am going to be filing a \$45 million lawsuit against the Grammy Awards/Recording Academy in Nashville, Tennessee and Mississippi and Columbia, South Carolina and New Orleans, Louisiana strategically in those 4 (four) jurisdictions because I have received favorable rulings there from Judge Aleta Trauger, Judge Carl Barbier, Judge Donna Phillips Currault, Magistrate Judge Shiva Hodges, and Judge Roy Percy who presides over my litigation against University of Miami. Just like the Denny's lawsuits, my \$45 million lawsuit against the Grammys alleges racial discrimination and that I am being discriminated against because I am a black man or African-American and that if I were a white man then my Grammys membership would have been reinstated. More specifically, there is someone named Robert Accatino who ended my Grammys membership and my lawsuit against the Grammys will mention that Robert Accatino is a racist Latino man. The recording artist known as The Weeknd also believes that the Grammys are racist. The Grammys are not popular anymore and have public relations problems because they give awards to Kanye West who is like Adolf Hitler and racist against Jews (anti-semitic). The Grammys probably also honored Robert Kelly (R. Kelly) who is a very sick man and Harvey Weinstein is also a very sick man in addition to Kevin Spacey. Russell Simmons is a fugitive in Bali, Indonesia and Afrika Bambaata has been accused by Ronald "Bee Sting" also of

being on the level of Harvey Weinstein and Kevin Spacey. The Grammys are not "above the law" and the Grammys are not "above Civil Rights lawsuits." I am letting you know that yesterday on August 3rd, 2023, I contacted all 12 chapters of the Grammys from my cellphone/Android to inform them that I am going to be filing lawsuits against the Grammys in Tennessee, Mississippi, South Carolina, and Louisiana and they could be docketed as early as next week depending on how long that takes me to draft up a complaint. Those Grammys numbers are the following: (202)662-1341 in Beltsville, Maryland and (215)985-5411 in Philadelphia and (212)245-5440 in New York and (305)672-4060 in Miami and (512)328-7997 in Texas and (615)327-8030 in Nashville, Tennessee and (901)525-1340 in Memphis and (312)786-1121 in Chicago and (206)834-1000 in Seattle and (415)749-0779 in San Francisco. Because Judge Aleta Trauger authorized service of process on Sony Music Entertainment through U.S. Marshals and Form USM-285, it is quite possible that a federal judge could authorize service of process on Grammys office on Olympic or Pico Boulevard through the United States Marshals Service (USMS). The number for the Grammys in Los Angeles is (310)392-3777 and as my own attorney pro se and in forma pauperis, I have the right to inform the Grammys that they are going to be a federal defendant in four lawsuits nationwide seeking punitive, compensatory, and treble damages regardless of whether or not the cases are dismissed before service of process. Lawyers and consumers contact businesses all the time to inform them of pending or upcoming litigation and African-Americans file civil lawsuits all the time and so the Grammys are not above litigation from former members, employees, or consumers who have to inform the Grammys of the litigation. The work ID number from ASCAP for Lady BRazil is **883637841**. The ISWC code for Lady Brazil from ASCAP is **T9112600369**. The IPI number for the songwriter of Lady Brazil from ASCAP is **484616724**. The IPI number for the publisher (Tunecore) of Lady Brazil from ASCAP is **641638348**. The ISRC code for Lady Brazil from Sound Exchange (generated by Ditto Music of England) is **USA2P1313567** with a time of **4:31**. The copyright number issued by the Library of Congress for Lady Brazil is **PAu003483176** / with an issue date of 2009-01-30. The case number for **Ronald Emrit v. ReverbNation** in North Carolina is **1:2014cv01014** filed on **December 4**,

2014 with Judge Patrick Auld. The song "Lady Brazil" was recorded at the Garrett Music Academy in Owings, Maryland (Calvert County) with D-Rail and the music video was in Quincy, Massachusetts involving Santiago Semino of Argentina, Pamela Masucci of The Beauty Within Models of Westerly, Rhode Island and their make-up artist and hair stylist.

III.) JURISDICTION AND VENUE

9.) According to Federal Rules of Civil Procedure 8(a)(1), Plaintiff is required to provide "a short and plain statement of the grounds for the court's jurisdiction, unless the court already has jurisdiction and the claim needs no new jurisdictional support;"

10.) Because the court does not already have personal or subject matter jurisdiction over this issue, it is necessary to engage in a brief discussion of the court's jurisdiction so that the defendants can not move to dismiss this case based on procedural grounds involving a lack of proper jurisdiction.

11.) Pursuant to 28 U.S.C.A. Section 1332, the U.S. District Court for the District of Western Michigan (as an Article III court) has jurisdiction over this matter because there is complete diversity of jurisdiction between the Plaintiff and the five defendants given that the plaintiff lives in Sarasota, Florida and no longer in Fort Worth, Texas.

12.) As an Article III court, the U.S. District Court for the District of Western Michigan also has subject matter jurisdiction over the present case at bar because this proceeding involves a discussion of Title VII of the Civil Rights Act of 1964, Americans with Disabilities Act of 1990, Equal Protection Clause, Due Process Clause, Fourth Amendment, and Privileges and Immunities Clause.

13.) Therefore, a federal question is presented by the implication of the black-letter law of the aforementioned federal statutes in addition to the discussion of Constitutional Law provisions.

14.) Venue in this jurisdiction is also proper pursuant to 28 U.S.C.A. Sections 1391 and 1400.

15.) Although the amount in controversy does not exceed \$75,000 (i.e. \$0 is less than \$75,000), this court has jurisdiction on the grounds of diversity and a federal question presented.

IV.) STATEMENT OF FACTS

16.) Robert Accatino of the Los Angeles chapter of the Grammy Awards ended the plaintiff's membership in the Grammys in 2010.

17.) The plaintiff recently contacted the Grammys expressing his desire to re-join the Grammy Awards and to take his Ukrainian fiancé to the Grammy Awards.

18.) The plaintiff also explained to the Grammys offices that he was a 2016 and 2020 presidential candidate with the number from the Federal Election Commission (FEC) as P60005535 and the committee number for the Political Action Committee (PAC) or Separate Segregated Fund (SSF) as C00569897.

19.) Accordingly, the number for Maria Cherniavska on Whatsapp is +380994339671

V.) COUNT ONE: VIOLATION OF THE CIVIL RIGHTS ACT OF 1964

30.) Just like the Denny's lawsuits, the Grammys have to pay attention to Civil Rights of African-Americans who are part of a suspect classification of discrete and insular minorities which have experienced invidious discrimination within the context of American jurisprudence.

31.) The recording artist professionally know as the "Weeknd" also expressed the fact that he believes that he has been discriminated against by the Grammys/NARAS based off of his status as an African-American.

32.) While the plaintiff is nowhere near as popular as The Weekend, the plaintiff is still an independent recording artist and former Grammys member who believes that he also has been discriminated against on the basis of race and ethnicity no different from The Weeknd.

33.) Therefore, the plaintiff believes that this lawsuit should be a class action lawsuit pursuant to Rule 23 of Federal Rules of Civil Procedure (FRCP) substantially similar to the litigation brought by Brian Flores of the Miami Dolphins in the National Football League (NFL) regarding head coach positions in the NFL.

34.) Pursuant to Rule 201 of Federal Rules of Evidence (FRE), the court should take judicial notice that the plaintiff also had litigation in 2019 and 2020 against The National Football League (NFL), Daniel Snyder, and Washington Redskins in which the Washington Redskins are now known as having a different mascot as “Washington Commanders.”

32.) Nevertheless, because the plaintiff is now trying to get married to Maria Cherniavska of Kharkiv, Ukraine, the plaintiff argues that it is necessary to provide her number on Whatsapp, i.e. +380994339671.

33.) Pursuant to Rule 201 of Federal Rules of Evidence (FRE), the court should take judicial notice that this number on Whatsapp has been uploaded in PACER or CM/ECF on Page 5 of an In Forma Pauperis Application/Affidavit submitted according to 28 U.S.C. Section 1915. Once again, that number on Whatsapp is +380994339671.

VI.) PRAYER FOR RELIEF

WHEREFORE, the plaintiff is seeking the equitable remedy of an injunction requesting that the court award the plaintiff \$45 million against the defendant Grammy Awards on CBS d/b/a The Recording Academy/NARAS. In asserting this “prayer for relief,” the plaintiff states, avers, and alleges the following:

A.) This proposed judgment in the amount of \$45,000,000 would be considered to be punitive, compensatory, and treble damages for the violation of The Civil Rights Act of 1964.

B.) This proposed judgment in the amount of \$45,000,000 would also be considered to be expectation, reliance, restitution, incidental, consequential, and/or liquidated damages as the material breach of contract since the plaintiff used to be in “privity of contract” with the sole defendant The Grammy Awards on CBS d/b/a The Recording Academy/NARAS

C.) Furthermore, the plaintiff is seeking the equitable remedy of an injunction requiring and/or mandating that the sole defendant reinstate the plaintiff’s Grammys membership as specific performance according to contract law.

D.)

Respectfully submitted,

A handwritten signature in black ink, reading "Ronald Satish Emrit". The signature is fluid and cursive, with the first name "Ronald" being the most prominent.

Ronald Satish Emrit

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